

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

George King,)	
)	
Complainant)	
)	Case No. 17-1542-TP-CSS
v.)	
)	
Frontier,)	
)	
Respondent.)	

**ANSWER AND AFFIRMATIVE DEFENSES
OF FRONTIER**

Frontier North, Inc. (“Frontier”), or Frontier as incorrectly captioned on the Complaint, appearing specially, and through its counsel, answers the July 3, 2017 Complaint (“Complaint”) of George King (“Complainant”) and raises its affirmative defenses thereto as follows:

GENERAL DEFENSE

Frontier is sympathetic to Complainant’s concerns that he is being erroneously billed for phone service. However, Frontier has examined its records and billing statements and Frontier finds that the charges were valid with no evidence of erroneous billing.

A. ANSWER

1. In response to the first page, Frontier denies that it had done anything unethical and denied that it has provided substandard service or charged improper billings. Further responding, Frontier states that Complainant called to disconnect his internet in April 2017, but specifically wanted to keep his phone service. Frontier further responds that billing records indicate that Complainant used his phone service every month in 2017, and Frontier did send a notice of disconnect for nonpayment in May 2017, and despite nonpayment, Frontier did not disconnect Complainant’s services. Frontier denies all other allegations in the first page of the Complaint.

2. In response to all other pages in the Complaint, Frontier denies all allegations.
3. Frontier denies all allegations not expressly admitted herein.

B. AFFIRMATIVE DEFENSE

1. The Complaint fails to allege any violation of any rule(s), regulation(s) or law(s) that would constitute a violation of any sort, or any unlawful action, and thus, the Complaint should be dismissed.

3. The Complaint fails to comply with OAC 4901:9-01 by not making a statement by which relief can be granted.

2. Frontier reserves the right to raise additional affirmative defenses or to withdraw any of the foregoing affirmative defenses as may become necessary during the investigation and discovery of this matter.

WHEREFORE, Frontier requests that the Complaint be dismissed with prejudice.

Respectfully submitted,

SQUIRE PATTON BOGGS (US) LLP

By: /s/ Michele L. Noble
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Answer and Affirmative Defenses of Frontier Communications was filed electronically and provided to the person listed below by U.S. mail, postage prepaid, on July 24, 2017:

George King
16042 US 23
Waverly, Ohio 45690-11
Complainant

/s/ Michele L. Noble
Michele L. Noble

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in

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Summary: Answer Answer of Frontier electronically filed by Michele L Noble on behalf of Frontier North Inc.